

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THE UNITED STATES OF AMERICA, et al.,
ex rel. JULIE LONG,

Plaintiffs,

v.

JANSSEN BIOTECH, INC.,

Defendant.

**Civil Action No.
16-12182-FDS**

**ORDER CONCERNING THE SCOPE OF
RELATOR'S FRCP 30(b)(6) DEPOSITION NOTICE**

SAYLOR, C.J.

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, the Court issues the following protective order concerning Relator Julie Long's Notice of Deposition of the Corporate Representative of Janssen under Federal Rule of Civil Procedure 30(b)(6).

1. In accordance with the Court's prior orders concerning the phasing of discovery, all testimony shall be generally limited to how the policy at issue (that is, the use of the "Area Business Specialists" to advise physician practices with respect to infusion products) ("the Policy") was devised, developed, and implemented in central Pennsylvania, the area where Relator was employed.
2. Topics One, Two, Four, Six, and Seven shall be limited to testimony concerning matters occurring during the period between October 2006 and February 2016, except that discovery shall be permitted as to matters occurring during the period between January 2000 and October 2006 as to the limited topics (1) how the

Policy was devised and developed and (2) how the company evaluated its legality; provided, however, that discovery shall be limited to non-privileged matters pending further order of the Court.

3. Topic Three shall be limited to information concerning Janssen's communications with the U.S. Government concerning (1) the Civil Investigative Demand served on Janssen on March 27, 2017, and the related investigation and (2) whether Janssen ever sought guidance or an advisory opinion from HHS-OIG concerning the Policy.
4. Topic Five shall be limited to non-privileged matters pending further order of the Court.

So Ordered.

Dated: December 1, 2021

/s/ F. Dennis Saylor IV
F. Dennis Saylor IV
Chief Judge, United States District Court